

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

NAJMAH TORRES-JUSTINIANO; and
TAMIKA PARKER as Next Friend of R.T.,
a minor child, as Wrongful Death
Representatives of Jose Torres.

PLAINTIFFS,

v.

CORECIVIC d/b/a “TROUSDALE
TURNER CORRECTIONAL FACILITY,”;
TROUSDALE COUNTY, TENNESSEE; a
Tennessee municipality; WARDEN
MARTEN FRINK, in his individual
capacity; LYBRUNCA COCKRELL, in her
individual capacity; TALBERT
JEFFERSON, in his individual capacity; and
JAQUELINE NORMAN, in her individual
capacity,

DEFENDANTS.

)
) **Case No. 3:23-cv-00191**
)
)
)
)

) **COMPLAINT FOR VIOLATIONS OF**
) **THE CIVIL RIGHTS ACT OF 1871, 42**
) **U.S.C. § 1983, AND TENNESSEE**
) **COMMON LAW**
)
)

) **JURY TRIAL DEMANDED**
) **PURSUANT TO FED. R. CIV. PRO. 38(a)**
) **& (b)**
)
)

MOTION TO WITHDRAW AS COUNSEL

COMES NOW Melissa J. Stewart (hereinafter “Ms. Stewart”) of Donati Law, PLLC, 1545 Union Avenue, Memphis, Tennessee 38104, and hereby files her *Motion to Withdraw as Counsel* for Plaintiff, Najmah Torres-Justiniano, and Tamika Parker, as next friend of R.T. a minor child, and as Wrongful Death Representative of Jose Torres, in the above titled action and moves this Honorable Court for entry of an Order allowing Ms. Stewart to Withdraw as Counsel for Plaintiffs. In support of her Motion to Withdraw as Counsel, Ms. Stewart states as follows:

1. Ms. Stewart, as an attorney with Donati Law, PLLC, represented the Plaintiffs in the cause of action.
2. Attorneys Brice M. Timmons and Craig A. Edgington have departed Donati Law, PLLC, are now affiliated with Watson Burns, PLLC, and will continue as counsel for the Plaintiffs.
3. Ms. Stewart is not joining Watson Burns, PLLC, and is not the responsible or retained attorney on this matter. Brice M. Timmons and Craig A. Edgington are the responsible attorneys and will continue to represent Plaintiff.
4. No party will be prejudiced by the granting of this motion.

WHEREFORE, PREMISES CONSIDERED, Melissa J. Stewart requests this Court permit her to withdraw as counsel of record for Plaintiff.

Respectfully submitted on this the 31st day of July 2024.

BY: /s/ Melissa J. Stewart
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CERTIFICATE OF CONSULTATION

I HEREBY CERTIFY that consultation with each of Defendants' attorneys occurred on July 8, 2024, via e-mail, and no Defendant had issues with the relief herein sought.

/s/Melissa J. Stewart

CERTIFICATE OF SERVICE

I certify that a true and exact copy of the foregoing has been served via e-transmission and/or the Court's ECF filing system this 31st day of July 2024, on the following:

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/s/ Melissa J. Stewart